

SEALED

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON GRAND JURY 2022
MAY 3, 2022 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:22-cr-00097

18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(2)
18 U.S.C. § 922(k)
18 U.S.C. § 924(a)(1)(B)

RANDY PRICE

I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

1. On or about July 16, 2019, at or near Charleston, Kanawha County, West Virginia, and within the Southern District of West Virginia, defendant RANDY PRICE did knowingly possess a loaded firearm, that is, a .25 caliber Raven Arms MP-25 pistol, in and affecting interstate commerce.

2. At the time RANDY PRICE possessed the aforesaid firearm, he knew he had been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year, as defined in 18 U.S.C. § 921(a)(20), that is:

- a. Convicted on or about June 28, 2002, in the Court of Common Pleas, Cuyahoga County, Ohio, Case No. CR-01-417799-ZA, for the felony offense of involuntary manslaughter in violation of R.C. 2903.04(A), of the State of Ohio; and
- b. Convicted on or about June 28, 2002, in the Court of Common Pleas, Cuyahoga County, Ohio, Case No. CR-01-417799-ZA, for the felony offense of aggravated robbery, in violation of R.C. 2911.01, of the State of Ohio.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWO

1. On or about July 16, 2019, at or near Charleston, Kanawha County, West Virginia, and within the Southern District of West Virginia, defendant RANDY PRICE did knowingly possess a loaded firearm, that is, a .25 caliber Raven Arms MP-25 pistol, which had the manufacturer's serial number removed, obliterated, and altered, and which firearm had been shipped and transported in interstate commerce at any time.

2. At the time defendant RANDY PRICE possessed the aforesaid firearm, he knew the manufacturer's serial number had been removed, obliterated, and altered.

In violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

NOTICE OF FORFEITURE

In accordance with 28 U.S.C. § 2461(c), 18 U.S.C. § 924(d)(1), and Rule 32.2(a) of the Federal Rules of Criminal Procedure and premised upon the conviction of defendant RANDY PRICE of a violation of 18 U.S.C. § 922(g)(1), § 924(a)(2), § 922(k), and § 924(a)(1)(B), as set forth in this Indictment, defendant RANDY PRICE shall forfeit to the United States any firearms and ammunition involved in or used in such firearm offenses, including, but not limited to a .25 caliber Raven Arms MP-25 pistol, with an obliterated serial number, and related ammunition which was seized by law enforcement on or about July 16, 2019.

WILLIAM S. THOMPSON
United States Attorney

By:



NEGAR M. KORDESTANI
Assistant United States Attorney